

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In Re:

Luis Anthony Ewing,

Debtor.

Case No. 13-47136

United States Trustee,

Plaintiff,

Adversary No. 14-04078

v.

Luis Anthony Ewing,

Defendant.

DECLARATION OF RUSSELL D.  
GARRETT IN SUPPORT OF  
MOTION FOR DEFAULT  
JUDGMENT

I, Russell D. Garrett, declare as follows:

1. I am the duly-appointed Chapter 7 Trustee in the chapter 7 case of debtor Luis Anthony Ewing (the "Chapter 7 Case" of the "Debtor").

2. I have personal knowledge of the facts set forth herein and, if called as a witness, I would testify competently thereto. This declaration is filed in support of the Motion by United States Trustee for Entry of Default and Default Judgment.

3. I conducted the initial meeting of creditors in the Chapter 7 Case that was held on January 15, 2014 (the "Initial Meeting"). After taking the Debtor's testimony, I continued the Initial Meeting to January 29, 2014 (the "Continued Meeting"), in part so that the Debtor could provide documentation regarding his income and Social Security verification.

1           4.     On January 29, 2014, the Debtor appeared and testified at the Continued Meeting.  
2 After taking additional testimony from the Debtor, I continued the meeting to February 19, 2014  
3 (the "Second Continued Meeting").

4           5.     On February 19, 2014, the Debtor again appeared and testified at the Second  
5 Continued Meeting.

6           6.     The Debtor's testimony at the three meetings of creditors included the following  
7 clearly stated facts by him:

8               a.     he earns income by providing legal services to pro se litigants in criminal  
9 cases. He advertises on the internet and receives referrals. His legal services include performing  
10 and providing legal research, analysis and evaluation of his client's cases and chances of success,  
11 and he drafts briefs or provides briefs for their court proceedings and assists in coaching them for  
12 oral argument.

13              b.     he purposefully, and by design, does not maintain income and expense  
14 records.

15              c.     he destroys all business records, including emails, between he and his  
16 clients on purpose.

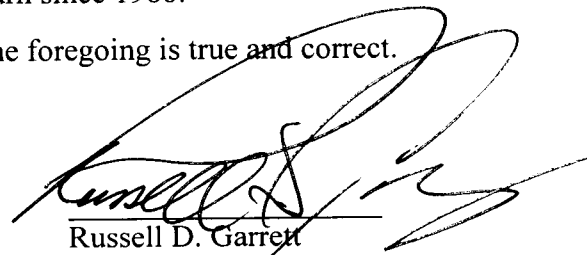
17              d.     although he claimed that he earns about \$1,800 a month, he acknowledged  
18 that he does not know how much he really earns in any period and has no records relating to  
19 income received. In fact, he testified several times quite emphatically that he purposefully does  
20 not maintain records so that there is no record of any of his transactions. He was unable to  
21 identify what he earned in any given period.

22              e.     he maintains no bank accounts and insists on being paid in cash for any  
23 services he provides.

24              f.     he has not filed a tax return since 1988.

25           I declare under penalty of perjury that the foregoing is true and correct.

26           Executed this 22<sup>nd</sup> day of April, 2014.

  
Russell D. Garrett